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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **OAKLAND DIVISION**

14 IN RE: SOCIAL MEDIA ADOLESCENT
15 ADDICTION/PERSONAL INJURY PRODUCTS
16 LIABILITY LITIGATION

17 This Document Relates To:

18 *The School Board of Hillsborough County, Florida*
19 *v. Meta Platforms, Inc., et al.*, No. 24-cv-01573

20 *Board of Education of Jordan School District v.*
21 *Meta Platforms, Inc., et al.*, No. 24-cv-01377

22 *Tucson Unified School District v. Meta Platforms,*
23 *Inc., et al.*, No. 24-cv-01382

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

Judge: Hon. Yvonne Gonzalez Rogers

TEMPORARY SEALING MOTION
(DEFENDANTS' MOTION TO
PRECLUDE PLAINTIFFS FROM
RELYING ON LATE-DISCLOSED
SCHOOL DISTRICT WITNESSES)

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), undersigned Defendants file this Temporary Sealing Motion regarding Defendants' Motion to Preclude Plaintiffs from Relying on Late-Disclosed Witnesses. Pursuant to that Order, the reasons for sealing (if any) will be addressed in a forthcoming omnibus stipulation or omnibus motion. By stating below that Plaintiffs may consider material to be confidential, Defendants are not taking a position regarding whether the material is in fact confidential.

Docket No.	Document	Whether Document Contains a Party's Confidential Information
1952-1	Defendants' Motion to Preclude Plaintiffs from Relying on Late-Disclosed School District Witnesses (Redacted)	Temporarily filing with redactions out of an abundance of caution because document contains information that Plaintiff Board of Education of Jordan School District may consider to be confidential.
1952-2	Declaration of Joseph Sandoval-Bushur (Not under seal)	
1952-3	Exhibit A (Sealed)	Temporarily filing under seal out of an abundance of caution because document contains information that Plaintiff the School Board of Hillsborough County, Florida may consider to be confidential.
1952-4	Exhibit B (Sealed)	Temporarily filing under seal out of an abundance of caution because document contains information that Plaintiff Board of Education of Jordan School District may consider to be confidential.
1952-5	Exhibit C (Sealed)	Temporarily filing under seal out of an abundance of caution because document contains information that Plaintiff Tucson Unified School District may consider to be confidential.

1	1952-6	Exhibit D (Sealed)	Temporarily filing under seal out of an abundance of caution because document contains information that Plaintiff the School Board of Hillsborough County, Florida may consider to be confidential.
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5	1952-7	Exhibit E (Sealed)	Temporarily filing under seal out of an abundance of caution because document contains information that Plaintiff Board of Education of Jordan School District may consider to be confidential.
6			
7			
8	1952-8	Exhibit F (Sealed)	Temporarily filing under seal out of an abundance of caution because document contains information that Plaintiff Tucson Unified School District may consider to be confidential.
9			
10			
11			
12	1952-9	Exhibit G (Sealed)	Temporarily filing under seal because document contains information that the parties may consider to be confidential.
13			
14	1952-10	Exhibit H (Not under seal)	
15	1952-11	Exhibit I (Not under seal)	
16	1952-12	Exhibit J (Not under seal)	
17	1952-13	Exhibit K (Not under seal)	
18	1952-14	Exhibit L (Sealed)	Temporarily filing under seal because document contains information that the parties may consider to be confidential.
19			
20	1952-15	Exhibit M (Sealed)	Temporarily filing under seal because document contains information that Plaintiff Board of Education of Jordan School District may consider to be confidential.
21			
22			
23	1952-16	Proposed Order (Not under seal)	

1 Dated: May 9, 2025

By: /s/ Ashley W. Hardin
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LOCAL RULE 5-1(i)(3) ATTESTATION

I, Joseph Sandoval-Bushur, hereby attest in accordance with Local Rule 5-1(i)(3) that each signatory has concurred in the filing of the document.

Dated: May 9, 2025

By: /s/ Joseph Sandoval-Bushur
Joseph Sandoval-Bushur, *pro hac vice*

Attorney for Defendants YouTube, LLC, Google LLC, and Alphabet Inc.

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with ECF No. 341, on May 9, 2025, this motion and all attachments thereto were served to the following email addresses:

PSCServiceMDL3047@motleyrice.com

MetaNoticeofService@cov.com

SnapNoticeofService@mtto.com

TikTokNoticeofService@faegredrinker.com

YouTubeServiceConfidentialDocs@wsgr.com

Dated: May 9, 2025

By: /s/ Joseph Sandoval-Bushur
Joseph Sandoval-Bushur, *pro hac vice*

Attorney for Defendants YouTube, LLC, Google LLC, and Alphabet Inc.